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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF WAYMO'S  
ADMINISTRATIVE MOTION TO SEAL  
PLAINTIFF WAYMO'S RESPONSE TO  
COURT INQUIRY RE ANY USE BY  
WAYMO OF EPHEMERAL  
COMMUNICATIONS AND NON-  
ATTRIBUTABLE DEVICES**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal (“Waymo’s Administrative Motion”) confidential information in its Response to Court Inquiry Re Any Use By Waymo of Ephemeral Communications and Non-Attributable Devices (“Waymo’s Response”). Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Response	Highlighted in blue	Defendants
	Highlighted in green	Waymo
Exhibit 3 to Waymo’s Response	Entire document	Waymo
Exhibit 4 to Waymo’s Response	Entire document	Waymo
Exhibit 5 to Waymo’s Response	Entire document	Waymo
Exhibit 6 to Waymo’s Response	Entire document	Waymo
Exhibit 7 to Waymo’s Response	Entire document	Waymo
Exhibit 8 to Waymo’s Response	Entire document	Defendants
Exhibit 11 to Waymo’s Response	Entire document	Waymo

3. Waymo’s Response contains or refers to confidential business information, which Waymo seeks to seal. Specifically, Waymo’s Response and Exhibits 3-7 and 11 contain confidential information regarding Waymo’s internal security policies and security guidelines for employees. The public disclosure of this information would reveal Google’s confidential security priorities, causing heightened vulnerability of Google’s internal servers and systems to increased threats of unauthorized access. If such information were made public, I understand that Waymo’s competitive standing would be significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential information.

4. Waymo’s Response and Exhibit 8 contain information that Defendants have designated as confidential and/or highly confidential.

